

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

TRACEY WHITE ET AL,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.: 4:14CV01490 HEA
)	
THOMAS JACKSON, ET AL,)	
)	
Defendants.)	

***DEFENDANTS CITY OF FERGUSON, THOMAS JACKSON,
JUSTIN COSMA, MATT DELIA, BRANDON MCKINNON, AND
RYAN DEVOUTON’S MOTION FOR LEAVE TO FILE IN EXCESS
OF FIFTEEN PAGES***

COME NOW, Defendants, City of Ferguson, former Ferguson Chief of Police Thomas Jackson, former Ferguson Police Officer Justin Cosma, and Maryland Heights Lieutenant Matt Delia and Officers Brandon McKinnon and David “Ryan” DeVouton (“Defendants”), and for their Motion to File Under Seal, state:

1. Defendants seek to file their Motion for Summary Judgment and accompanying memoranda and with exhibits attached, pursuant to Local Rule 2.17.
2. Local Rule 2.17 requires that certain information be redacted and that either an unredacted copy of the document be provided or a reference sheet containing a key to the redacted personal identifiers be prepared.
3. Defendants hereby submit unredacted copies of Exhibits D and S to their Memorandum in Support of their Motion for Summary Judgment in compliance with Local Rule 2.17.

4. Unless otherwise ordered by this Court, Defendants also pray to have the exhibits filed under seal to protect witnesses' rights to privacy (regarding date of birth and social security numbers). Defendants will provide unredacted exhibits separately to all other parties in this matter to avoid prejudice.
5. For good cause as explained above, Defendants respectfully request that the documents be returned to Defendants, as opposed to being made public, at the conclusion of litigation. Local Rule 83- 13.05(A)(2).

WHEREFORE, the Defendants respectfully pray that this Court allow Defendants to File the above exhibits consistent with their request, and for such other relief, that the documents be returned to Defendants at the conclusion of litigation as opposed to being placed in the public file, and for such further relief as this Court deems just and proper

/s/Peter J. Dunne

Peter J. Dunne #31482MO

Robert T. Plunkert #62064MO

PITZER SNODGRASS, P.C.

Attorneys for Defendants City of Ferguson,

Chief Thomas Jackson, Officers Justin Cosma,

Matt Delia, Devouton, and McKinnon

100 South Fourth Street, Suite 400

St. Louis, Missouri 63102-1821

(314) 421-5545

(314) 421-3144 (Fax)

I hereby certify that a copy of the foregoing filed electronically with the Clerk of the Court this 7th day of April, 2016, to be served by operation of the Court's electronic filing system upon the following:

- Gregory L. Lattimer, Attorney for Plaintiffs, 1200 G. Street, N.W., Suite 800, Washington, D.C. 20005, lattlaw@aol.com;
- Malik Z. Shabazz, Attorney for Plaintiffs, 1200 G. Street, N.W., Suite 800, Washington, D.C. 20005, attorney.shabazz@yahoo.com;
- Reginald A. Green, Attorney for Plaintiffs, One Georgia Center, Suite 605, 600 West Peachtree Street, N.W., Atlanta, Georgia 30308, rgreene@greenelegalgroup.com; and
- Michael E. Hughes, Attorney for Defendants St. Louis County and Chief Jon Belmar, 41 S. Central Ave, Clayton MO 63105, mhughes2@stlouisco.com.
pgunn@stlouisco.com.

/s/ Peter J. Dunne
